

FILED  
CLERK'S OFFICE  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

ALBERT WILLIAM BLEAU, JR.,

Plaintiff,

v.

GREATER LYNN MENTAL HEALTH &  
RETARDATION ASSOCIATION, et al.,

Defendants.

2005 APR 13 P 2:32

UNITED STATES DISTRICT COURT  
DISTRICT OF MASS.

Civil Action No.: 04-10469-REK

**JOINT MOTION FOR EXTENSION OF TIME TO AND INCLUDING APRIL 20, 2005  
TO RESPOND TO PLAINTIFF'S MOTIONS**

The defendants, Roderick MacLeish, Jr. and Robert A. Sherman (collectively, the "Defendants"), and the Plaintiff, Albert W. Bleau, Jr. hereby jointly move to allow Defendants a small extension of time of two extra days, to and including April 20, 2005, within which to respond to the five Motions and one Amendment that Bleau served on Defendants between March 9 and March 23, 2005. In support of their request, the Parties state as follows:

1. On or about March 9, 2005, Defendants received a variety of motions and oppositions from Plaintiff, which included a Motion Requesting Extension to File Response Brief and Motions, a Motion Requesting Relief to Prevent Continuing Retaliation and Defamation by the Defendants, Motion for Summary Judgment of Plaintiff Albert W. Bleau, and a Motion in Opposition to Defendants' Greater Lynn Mental Health & Retardation Association, et al, Motions for Summary Judgment, Dismissal, and Entry of Separate and Final Judgment & Memorandum of Plaintiff Albert W. Bleau, Jr. in Support of His Motion for Summary Judgment.

2. On March 23, 2005, Defendants received an amendment to Plaintiff's Motion in Opposition to Defendants' Greater Lynn Mental Health & Retardation Association, et. al,

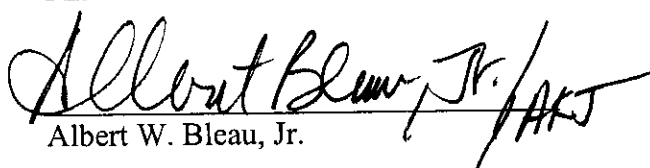
Motions for Summary Judgment, Dismissal and Entry of Separate and Final Judgment & Memorandum of Plaintiff Albert W. Bleau, Jr. in Support of His Motion for Summary Judgment Originally Filed on March 9, 2005 and a Motion to Amend Original Complaint Dated March 8, 2005 to Bring Action Under the Racketeer Influenced and Corrupt Organization Act (RICO), 18 U.S.C. §§ 1961-62 (2000).

3. Plaintiff Bleau also has indicated that he intends to amend his Motions as additional evidence and affidavits become available. Due to the enormous volume of motions and exhibits attached thereto, and because the Plaintiff amended his earlier response to Defendants' Motion to Dismiss, the Defendants, respectfully request an extension of two extra days, in which to properly reply to Plaintiff's motions and amendments as enumerated above, to and including Wednesday, April 20, 2005.

4. Plaintiff Bleau has assented to the proposed extension to and including April 20, 2005, to allow Defendants time to respond to all his current Motions and amendments.

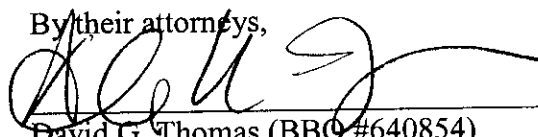
**WHEREFORE**, Defendants, together with the Plaintiff Bleau, respectfully request that this Court allow an extension within which Defendants may file their responses to Bleau's five motions as enumerated above to and including April 20, 2005.

PLAINTIFF ALBERT W. BLEAU, JR.,

  
Albert W. Bleau, Jr.

DEFENDANTS RODERICK MacLEISH and  
ROBERT SHERMAN.

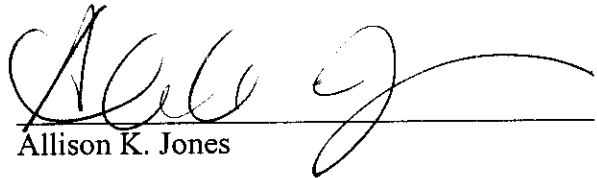
By their attorneys,

  
David G. Thomas (BBO #640854)  
Allison K. Jones (BBO# 654804)  
GREENBERG TRAURIG, LLP  
One International Place, 20<sup>th</sup> Floor  
Boston, MA 02110  
(617) 310-6000

Dated: April 13, 2005

CERTIFICATE OF SERVICE

I, Allison K. Jones, hereby certify that on this 13th day of April, 2005 I served a copy of the foregoing by e-mail and U.S. mail, postage prepaid, upon the Plaintiff, Albert W. Bleau, Jr., 505 Paradise Road, #208, Swampscott, Massachusetts 01907 and the attorney of record for each other party.

  
Allison K. Jones